2016 FERPA UPDATE
BACK TO THE BASICS
(OR BACK TO THE FUTURE?)

NSBA SCHOOL LAW SEMINAR
APRIL 7, 2016

FAMILY EDUCATIONAL RIGHTS
AND PRIVACY ACT (FERPA)

• Statute: 20 U.S.C. § 1232g
• Regulations: 34 CFR Part 99
• Family Policy Compliance Office (FPCO) in U.S. Department of Education administers FERPA.
PURPOSES OF FERPA

20 U.S.C. § 1232g states, “[n]o funds shall be made available under any applicable program to any educational agency or institution which has a policy of:”

1) Denying or preventing the parents of students or former students the right to inspect and review the education records of their children. 20 U.S.C. § 1232g(a)(1)(A).

2) Denying or preventing parents of students the right to inspect and review the education records maintained by the state educational agency on their children. 20 U.S.C. § 1232g(a)(1)(B).
PURPOSES OF FERPA

3) Unless the parents of students or former students are provided an opportunity for a hearing to challenge the content of the student’s education records, in order to ensure that the records are not inaccurate, misleading, or otherwise in violation of the privacy rights of students, and to provide an opportunity for the correction or deletion of any such data contained therein, and to insert a written explanation of the parents respecting the content of those records. 20 U.S.C. § 1232g(b)(2).

PURPOSES OF FERPA

4) Permitting the release of education records (or personally identifiable information) without the written consent of their parents to any individual agency or organization. 20 U.S.C. § 1232g(b)(1).

5) Releasing, or providing access to, any personally identifiable information in the education records other than directory information as is permitted. 20 U.S.C. § 1232g(b)(2).
APPLICABILITY

• FERPA only applies to agencies or institutions which have received federal funding. FERPA will not apply to educational agencies or institutions solely because their students receive non-monetary benefits under a federal program. 34 C.F.R. § 99.1(b).

• Federal funds include funds provided:
  ➢ By grant, cooperative agreement, contract, subgrant, or subcontract or
  ➢ To the students attending and the funds are paid to the agency or institution by the students for educational purposes such as federal grant or loan programs. 34 C.F.R. § 99.1(c).

PREEMPTION OF STATE LAWS

• Open Record Statutes

• Open Meetings Act

• Reporting to State agencies or law enforcement
CONFLICTS WITH FEDERAL LAWS

- CAPTA
- Title IX

DEFINITIONS

Attendance – 34 C.F.R. § 99.3

- FERPA applies to students who are or have been in “attendance” at a school or institution;
- Includes more than in-person attendance:
  - Virtual schools by video conference, satellite, internet, or computer are still considered to be in attendance;
  - “Work study” program.
DEFINITIONS


• Records, files, documents and other materials which (i) contain information directly related to a student and (ii) are maintained by an educational agency or institution or by a person acting for them.

DEFINITIONS

• “Record” means any information recorded in any way
  ➢ Including but not limited to handwriting, print, computer media, video or audio tape, film, microfilm, and microfiche.
  ➢ Written before the advent of text, cloud based computing, e-mail, and other technological advances; expansive enough to cover virtually all documents in any medium?
DEFINITIONS

• What does “directly related to a student” mean?
  ➢ Any time a student is named in a record, is it a covered record?
  ➢ Does it include records unrelated to the student’s education?

Because of the expansive nature of FERPA, it is wise to consider any record with the student’s name as covered unless it falls into an exception.

  ➢ “The word ‘maintain’ suggests FERPA records will be kept in a filing cabinet in a records room at the school or on a permanent secure database, perhaps even after the student is no longer enrolled.”

• S.A. v. Tulare
• ESPN Inc. v. Ohio State Univ.
  ➢ Conflicting holdings on e-mails
The definition of “Education Records” is one of the revisions being discussed currently.

One draft of legislation to revise FERPA defines “education records” as:

- “Those records, files, documents, and other materials which contain information directly related to a student and are:
  - (i) maintained, electronically or physically by an educational agency or institution or by a person acting for such agency or institution;
  - (ii) accessible, collected, used, or maintained by an education service provider; or
  - (iii) created by or for the state educational agency even though a student who attends a school subject to this section may not attend a school run by such State education agency.”
DEFINITIONS

Exceptions to the Definition of “Education Records”
– 20 U.S.C. § 1232g(a)(4)(B); 34 C.F.R. § 99.3

1) Records of instructional, supervisory, administrative personnel, and educational personnel ancillary thereto which are in the sole possession of the maker thereof, and which are not accessible or revealed to any other person except a substitute. (This is often called the “sole possession” exception);

2) Records maintained by a law enforcement unit of the educational agency or institution that were created by that law enforcement unit for the purpose of law enforcement; see also 34 C.F.R. §99.8, and the Letter to Montgomery County Public Schools (MD) re: Law Enforcement Unit Records, 2/15/2006.

3) Records relating to an individual who is employed by an educational agency or institution that are made and maintained in the agencies normal course of business and relate exclusively to the individual in the capacity of an employee (as opposed to a student) and are not available for use for any other purpose;
DEFINITIONS


4) Records relating to an individual in attendance at an educational agency institution who is also employed as a result of his or her status as a student;

5) Records on a student who is 18 years of age or older, or is attending an institution of post-secondary education, that are made or maintained by a physician, psychiatrist, psychologist, or other professional acting in his or her professional capacity for purposes of treatment of the student and which are disclosed only to the individuals providing the treatment;

6) Records created or received by an educational agency or institution after the individual is no longer a student in attendance and they are not directly related to the individual’s attendance as a student;

7) Grades on peer-graded papers before they are collected and recorded by a teacher. (Added following the Falvo decision discussed above).
DEFINITIONS

Eligible Student – 20 U.S.C. § 1232g(d); 34 C.F.R. § 99.3

- An “eligible student” means a student who has reached 18 years of age or is attending an institution of post-secondary education.

- Generally, FERPA rights transfer to the student when the student reaches 18 years of age. However, also note that any attendance at a post-secondary institution of education can make a student, even if under 18 years of age, an “eligible student”.

DEFINITIONS

Personally Identifiable Information – 34 C.F.R. § 99.3

- FERPA does not specifically define what Congress intended “personally identifiable information” to be; It includes (not exhaustive):
  - The student’s name;
  - The name of the student’s parent(s) or other family members;
  - The address of the student or student’s family;
Personally Identifiable Information – 34 C.F.R. § 99.3

- A personal identifier,
  - Student’s social security number, student number, or biometric record;
- Other indirect identifiers,
  - Date of birth, place of birth or mother’s maiden name.

Subsection (f)
- prohibits the release of information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances to identify the student with reasonable certainty.
DEFINITIONS

Personaly Identifiable Information – 34 C.F.R. § 99.3

- The information can be released if sufficient redactions can be made to remove information which would allow the receiving party to trace the identity of the student’s whose information was included in a response to a Public Records Request. See Letter to Miami University re: Disclosure of Information Making Student’s Identity Easily Traceable (10/19/04); Letter to Georgia Board of Regents re: Open Records Request (9/25/03); Letter to Kennesaw State Univ., Georgia re: Open Records Request (9/27/02).

DEFINITIONS

Personaly Identifiable Information – 34 C.F.R. § 99.3

- Subjection (g)
  - Includes information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates;

- If the information cannot be redacted so as not to identify the student, it cannot be released.
DEFINITIONS

Directory Information – 20 U.S.C. 1232g(a)(5)(A) and 34 C.F.R. § 99.3

• Information contained in an education record of a student that would not generally be considered harmful or an invasion of privacy, if disclosed.
  ➢ Student’s name, address, telephone listing, date and place of birth;
  ➢ Major, dates of attendance, degrees and awards received;
  ➢ Participation in officially recognized activities and sports;
  ➢ Weight and height of members of athletic teams;
  ➢ Most recent educational agency or institution attended;
  ➢ Electronic mail addresses and photographs;
  ➢ Student identification numbers or user identification.

Schools are not required to release directory information.

Can limit its release to specific parties or purposes.

Concerns about commercial use.
**WARNING!**

- Proposed revision to ban use for marketing or advertising without written consent.

- Problems:
  - Can you ask why it was requested?
  - Can you keep up with all usage?
  - Even by third parties in lawful possession?
  - Lack of definition?

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**DEFINITIONS**

**Parent** – 34 C.F.R. § 99.3

- Includes a natural parent, a guardian, or an individual acting as a parent in the absence of a parent or a guardian;

- Be aware that such persons’ rights under FERPA may be greater than they would appear on the face of the situation.

- Parental rights revoked in divorce decrees?
PARENTAL & STUDENT RIGHTS UNDER FERPA

Annual Notification – 34 C.F.R. § 99.7

• Must annually notify the parent(s) of students in attendance at their school of their rights under FERPA.

• Must inform parents or eligible students that they:
  ➢ Have right to inspect and review the student’s education records;
  ➢ Can seek amendment of the education records if they believe them to be inaccurate, misleading, or in violation of the student’s rights;
  ➢ Must consent to disclosure of personally identifiable information unless FERPA and regulations authorize disclosure without consent; and
  ➢ Have the ability to file a complaint with the Department of Education concerning FERPA violations;

• The notice can be sent by any means that are reasonably likely to inform the parents or eligible student of their rights.

• Combine with annual notice on discovery information?

• Parents’ “opt out” forms
  • All or none?
PARENTAL & STUDENT RIGHTS UNDER FERPA


• A parent or eligible student must be given the opportunity to inspect and review the student’s education records.

• This right is applicable to any educational agency or institution and any state educational agency and its components which maintain such records;

• A school may not destroy any education records if there is a pending request to inspect or review those records.

PARENTAL & STUDENT RIGHTS UNDER FERPA


• Must comply with that request within a reasonable time period, but not more than 45 days after its receipt of the request;

WARNING! FERPA revisions – 30 days
WHAT CAN THE SCHOOL DISCLOSE FROM VIDEO (INCLUDING BUS VIDEOS AND HALLWAY MONITOR VIDEOS)?

VIDEOS

• Old rule – 34 C.F.R. § 99.12(a) prohibits video review without redaction or digital alteration to remove other students.

• Some courts disagreed:
  ➢ Rome City School District v. Grifasi
  ➢ Lindeman v. Kilso
• New Rule:
  ➢ 2006 – Texas Attorney General Opinions:
    - OR 2006-00484, 2006 WL 208275 (Jan 13, 2006)
    - OR 2006-07701, 2006 WL 2140988 (July 18, 2006)
  ➢ Parents of students who are the focus of the video can each inspect (no copy without consent).
  ➢ Students not the focus – “Set dressing” unless used as witness by school.
• 34 C.F.R. § 99.3 (f) and (g) definition issues:
  - Consent? Other exceptions in 34 C.F.R. § 99.31?
  - Similar to “video” guidance when rights of two students involved???

PARENTAL & STUDENT RIGHTS UNDER FERPA


• Parent or eligible student may seek amendment of records which they believe to be inaccurate, misleading, or in violation of the student’s rights of privacy.

• Must be decided within a reasonable time after receipt of the request from the parent or eligible student;

• If not amended; inform the parent or eligible student of right to have a hearing.

• Statement placed in records of disagreement.
DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS
20 U.S.C. 1232g; 34 C.F.R. SUBPART D, 99.30 ET SEQ.

To release any student education records to persons other than parents or the eligible student:

- A signed and dated written consent from the parent or eligible student must be provided before a school can disclosure personally information from the student’s education records, except as provided in § 99.31.
- Must specify the records to be disclosed, the purpose of the disclosure, and the identity of the party or class of parties to whom the disclosures may be made.
- § 99.31 provides a detailed list of conditions under which prior consent is not required to disclose information.

DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

§ 99.31(a)(1) – Disclosure to other school officials whom the school has determined have a legitimate educational interest.

- School’s attorney, board members, district consultants, contractors, volunteers, school resource officers, any outside service provider, an employee of a co-op with which the school district contracts for placement of students with disabilities, and a parent or student serving on an official committee such as a disciplinary or grievance committee.
Conditions for outsourcing institutional services or functions to outside parties:

- Performs an institutional service or function for which the agency or institution would otherwise use employees;
- Is under the direct control of the agency or institution with respect to the use and maintenance of education records.

Conditions for outsourcing institutional services or functions to outside parties, cont.:

- Is subject to the requirements in § 99.33(a) that the PII from education records may be used only for the purposes for which the disclosure was made, e.g., to promote school safety and the physical security of students, and governing the redisclosure of PII from education records; and
- Meets the criteria specified in the school, LEA, or institution’s annual notification of FERPA rights for being a school official with a legitimate educational interest in the education records.
WHAT CAN THE SCHOOL GIVE WHEN SROS ASK FOR STUDENT RECORDS?

REMEMBER

“Letter to Montgomery County Public Schools (MD) regarding: Law Enforcement Unit Records.”
“Legitimate educational interests” include:

- working with a student;
- considering disciplinary or academic actions;
- participating in an individualized education program committee;
- compiling school data for the school;
- reviewing education records to fulfill the official’s professional responsibilities; or
- investigating or evaluating school programs.

§ 99.31(a)(2) – Disclosure to officials of another school, school system, or post-secondary educational institution where the student seeks or intends to enroll, or where the student is already enrolled so long as the disclosure is for purposes related to the student’s enrollment or transfer.
DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

§ 99.31(a)(3) and § 99.35 – Disclosure to the Comptroller General of the United States, the Attorney General of the United States, Secretary of Education, or state and local educational authorities in connection with an audit or evaluation of federal or state supported education programs or for the enforcement of or compliance with the federal legal requirements related to those programs.

DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

• A written agreement must be used to:
  ➢ designate authorized representatives of the agencies other than employees,
  ➢ specify personally identifiable information to be disclosed,
  ➢ specify that the purpose for such disclosure is to carry out the audit or evaluation to federal or state supported educational programs,
DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

• A written agreement must be used to:
  
  - provide a description of the activity with sufficient specificity to make clear the work falls within this exception, and
  
  - require the authorized representative to destroy personally identifiable information from education records when no longer needed for the specified purposes and specify the time period in which the information must be destroyed.

§ 99.31(a)(4) & 20 U.S.C. § 1232g(b)(1)(D) – Disclosures in connection with financial aid for which the student has applied or received, if necessary to determine eligibility for the aid, the amount of the aid, the conditions for the aid, and enforcement of the terms and conditions of the aid.
DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

• § 99.31(a)(5) – Disclosures to state and local officials or authorities allowed under state statutes concerning the juvenile justice system and the system’s ability to effectively serve the student whose records are release and disclosed.

• § 99.31(a)(6) – Disclosures to organizations conducting studies for, or on behalf of educational agencies or institutions to develop, validate, or administer predictive tests; administer student aid programs; or improve instruction.

• § 99.31(a)(7) – Disclosure to accrediting organizations to enable them to carry out their accrediting functions.

• § 99.31(a)(8) – Disclosure is to parents of a dependent student as defined by the Internal Revenue Code.

SUBPOENA EXCEPTION TO FERPA

• The most commonly used exception to the prior written consent requirement that would allow a school district to release information to the police without the parent’s consent would be in compliance with a judicial order or lawfully issued subpoena. See 34 C.F.R. 99.31(a)(9).

• District must make a reasonable effort to notify the parent or adult student of the order or subpoena (except in certain circumstances) before releasing the information.

• Purpose of the notice requirement is to give the parent or adult student enough time to seek an order from a court prohibiting the release of the documents.
SUBPOENA EXCEPTION TO FERPA

• Notice to the parent is not required if the disclosure in compliance with:
  ➢ a Federal grand jury subpoena and the court has ordered that the existence or the contents of the subpoena or the information furnished in response to the subpoena not be disclosed; or
  ➢ any other subpoena issued for a law enforcement purpose and the court or other issuing agency has ordered that the existence of the contents of the subpoena or the information furnished in response to the subpoena not be disclosed.
  ➢ An ex parte order from the U.S. Attorney General or Assistant AG re the investigation of foreign or domestic terrorism.

DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

• Judicial Order or Lawfully Issued Subpoenas
  →Exception to Exception←

If school initiates legal action against a parent or student, the school may disclose to the court – without a court order or subpoena – the education records of the student that relevant to proceed with the legal action as plaintiff.
If a parent or eligible student initiates legal action against school, the school may disclose – without a court order or subpoena – the student’s education records that are relevant for the school to defend itself.
§ 99.31(a)(9)(iii)(A) & (B)
DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

• **Health or Safety Emergency Disclosures**
  
  <small>(§ 99.31(a)(10) and § 99.36)</small>

  ➢ Disclosure is necessary to protect the health or safety of the student or other individuals.
  
  ➢ To appropriate parties whose knowledge of information is necessary to protect the health or safety of the student or other persons.
  
  ➢ Appropriate parties typically means local, State, or federal law enforcement, trained medical personnel, public health officials, and parents.
  
  ➢ Must be related to an actual, impending, or imminent emergency.

DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

• **Health or Safety Emergency Disclosures**,

  ➢ Must be articulable and significant threat.
  
  ➢ School must make determination on case-by-case basis.
  
  ➢ Department will not substitute its judgment if there is a rational basis for decision to disclose under health or safety emergency exception.
  
  ➢ Limited to period of time of the emergency.
  
  ➢ Must record disclosure.
DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

- § 99.31(a)(11) – The information disclosed is designated as “directory information” in the conditions in § 99.37 were complied with in the disclosure.

- § 99.31(a)(12) – Disclosures to the parent of a student who is not an eligible student or to the student.

DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

- § 99.31(a)(13) – Disclosure by a post-secondary education institution to a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense.

- § 99.31(a)(14) – Disclosure by an institution of post-secondary education in connection with a disciplinary proceeding in which it was determined that the student was an alleged perpetrator of a crime of violence or non-forcible sex offense, and with regard to the allegations against the student, the student has committed a violation of the institutions rules or policies.
DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM EDUCATION RECORDS - EXCEPTIONS

• § 99.31(a)(15) – Disclosure to a parent of a student at an institution of post-secondary education regarding the student’s violation of state, federal, or local laws governing the use or possession of alcohol or controlled substances, if the institution has determined that the student committed a disciplinary violation with respect to that use or possession, and the student is under the age of 21 at the time of disclosure.

• § 99.31(a)(16) – Disclosure concerning sex offenders and other individuals required to register under federal law.

• § 99.31(b) – Educational agencies or institutions, or a party that has received educational records from them under § 99.31, may release records or information without consent after the removal of all personally identifiable information as long as the agency, institution, or other party has made a reasonable determination that a student’s identity is not personally identifiable.
Disclosure of Personally Identifiable Information from Education Records

- **Record Keeping Requirements - § 99.32**
  - Must maintain a record of each request for access to and each disclosure of personally identifiable information, as well as authorities or officials that might make further disclosures.
  - Must include parties that have requested or received the information and the legitimate interest the parties had.

- Must also obtain a copy of any further disclosures made after the removal of personally identifiable information under § 99.31(b).

- Upon request of an education agency; a State or local education authorities, or federal authorities listed in § 399.31(a)(3) must provide copies of the re-disclosed information within 30 days of the date of the request.
WHAT ARE THE PENALTIES FOR FERPA VIOLATIONS? HAS ANY DISTRICT EVER ACTUALLY LOST FEDERAL FUNDS?

Enforcement Procedures

- FPCO investigates complaints alleging violations of FERPA and provides technical assistance.
- FPCO works with educational agencies and institutions to bring them into voluntary compliance with FERPA before taking action to terminate assistance.
ENFORCEMENT PROCEDURES

• 20 U.S.C. § 1232g(f) provides that the Secretary of Education is to take appropriate actions to enforce the section and to deal with violations,

  ➢ but that the action to terminate assistance (funds) may only be taken if the Secretary finds that there has been a failure to comply with the section, and has determined that compliance cannot be secured by voluntary means. 34 C.F.R. 99.67.

ENFORCEMENT PROCEDURES

• 2011 regulatory changes expanded enforcement provisions to include any recipient of ED funds, not just schools.

• Enforcement options for failures to comply substantially with FERPA:
  ➢ Issue cease and desist order;
  ➢ Recover funds improperly spent;
  ➢ Withhold further payments;
  ➢ Enter into compliance agreement; or
  ➢ Take “any other action authorized by law” (United States v. Miami Univ., 294 F.3d 797 (6th Cir. 2002)).
• Congress amended FERPA in 1994 to add “5-Year Rule.” FPCO can determine that school may not permit 3rd party outside of school access to education records, under these circumstances:
  - 3rd party outside of school that received PII under any of the exceptions to general consent requirement (§ 99.31) improperly rediscloses; or
  - 3rd party receiving PII under FERPA’s studies exception (§ 99.31(a)(6)) fails to destroy information.

• United States v. Miami University, 294 F. 3d 707 (6th Cir. 2002).
  - Department of Education was authorized to bring a cause of action for injunctive relief in order to halt or prevent a violation of FERPA under 20 U.S.C. § 1234(c).
  - The court allowed the Department to take preemptive actions rather than waiting for the violations to occur.
  - “[O]nce personally identifiable information has been made public, the harm cannot be undone.” Id. At 818.
ENFORCEMENT PROCEDURES

  ➢ No individual cause of action was created under FERPA or was enforceable under 42 U.S.C. § 983 for alleged wrongful disclosure of education records.
  ➢ Did not address whether there might be individual causes of action for other FERPA requirements, such as parents’ rights to inspect and review their children’s education records and affording parents an opportunity for a hearing to challenge the content of the student’s education records.
  ➢ Although no cases of such a nature have been found, it appears that there is some potential that an individual cause of action might exist under FERPA for violations of FERPA’s rights and requirements.

WARNING!

• Proposed Revisions:
  ➢ Increased enforcement and compliance
    ❖ Fines of $2,000 per student up to $500,000
    ❖ New compliance office
WARNING!

• Proposed Revisions:
  ➢ Designation of a “security officer”
  ➢ Require third parties to comply
  ➢ Written agreements to guarantee security
  ➢ Post agreements online

Current Draft Issues

• Proposed Revisions:
  ➢ “Transparent” parent notice
  ➢ Parent “opt out” for research studies
NEED HELP WITH FERPA?

GUIDANCE DOCUMENTS & FERPA REGULATIONS

- Addressing Emergencies on Campus

- Joint FERPA-HIPAA Guidance

- FERPA & Disclosures Related to Emergencies & Disasters
GUIDANCE DOCUMENTS & FERPA REGULATIONS

• Balancing Student Privacy & School Safety

• Current FERPA Regulations

• Amendments to FERPA Regulations (Effective 1/3/12)

GUIDANCE DOCUMENTS & FERPA REGULATIONS

• Model Notifications LEAs:

• Postsecondary: http://www2.ed.gov/policy/gen/guid/fpco/ferpa/ps-officials.html
ALSO SEE:

  - “Transparency Best Practices for Schools and Districts” July 2014
  - “Protecting Student Privacy While Using Online Educational Services: Requirements and Best Practices” February 2014
  - “Cloud Computing and Student Privacy: A Guide for School Attorneys”.

FPCO CONTACT INFORMATION

- For technical assistance and advice to school officials:
  
  Family Policy Compliance Office  
  U.S. Department of Education  
  400 Maryland Avenue, SW  
  Washington, DC 20202-8520  
  (202) 260-3887 Telephone  
  (202) 260-9001 Fax

- For informal requests for technical assistance, e-mail us at: FERPA@ed.gov

- FPCO Web site: www.ed.gov/fpc
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NSBA SCHOOL LAW SEMINAR
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